

UNITED STATES DISTRICT COURT  
for the  
Southern District of California

N.Z., R.M., B.L., S.M., and A.L., )  
individually and on behalf of themselves )  
and all others similarly situated, )  
\_\_\_\_\_  
*Plaintiff(s)* )  
v. ) Civil Action No. 8:24-cv-01655-FWS-SSC  
FENIX INTERNATIONAL LIMITED, FENIX INTERNET LLC, )  
BOSS BADDIES LLC, MOXY MANAGEMENT, UNRULY )  
AGENCY LLC (also d/b/a DYSRPT AGENCY), BEHAVE )  
AGENCY LLC, A.S.H. AGENCY, CONTENT X, INC., VERGE )  
AGENCY, INC., AND ELITE CREATORS LLC, )  
\_\_\_\_\_  
*Defendant(s)* )

**SUMMONS IN A CIVIL ACTION**

To: (*Defendant's name and address*) FENIX INTERNATIONAL LIMITED  
9th Floor, 107 Cheapside  
London, EC2V 6DN  
United Kingdom

(See Attachment A)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Christopher R. Pitoun (SBN 290235)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
301 N. Lake Avenue, Suite 920  
Pasadena, California 91101  
Telephone: (213) 330-7150; Facsimile: (213) 330-7152  
Email: christopher@hbsslaw.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Brian D. Karth  
CLERK OF COURT

Date: August 2, 2024

/s/ *Jenny Lam*  
Signature of Clerk or Deputy Clerk



Civil Action No. 8:24-CV-01655-FWS-SSC

## **PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

This summons for: VERGE AGENCY, INC.  
was received by me on August 6, 2024

I personally served the (( SEE DOCUMENTS ON ATTACHED LIST )) on the individual at on

I left the \_\_\_\_\_ at \_\_\_\_\_ with \_\_\_\_\_, a person of suitable age and discretion who resides there, on \_\_\_\_\_, and mailed a copy to the individual's last known address; or

I served the SUMMONS IN A CIVIL ACTION; COMPLAINT; CIVIL COVER SHEET; NOTICE TO ASSIGNMENT TO UNITED STATES JUDGES; NOTICE TO COUNSEL RE CONSENT TO PROCEED BEFORE A UNITED STATES MAGISTRATE JUDGE; CIVIL STANDING ORDER; NOTICE TO PARTIES OF COURT-DIRECTED ADR PROGRAM; CERTIFICATION AND NOTICE OF INTERESTED PARTIES to Eresident, Inc., Agent for Service of Process by serving Lilly Ashley, authorized person to accept service of process, who is designated by law to accept service of process on behalf of VERGE AGENCY, INC. on (date) August 7, 2024 at 1013 Centre Road, Suite 403S , Wilmington, DE 19805; or  
 other (specify):

*My fees are \$ for travel and \$ for services, for a total of \$ 445.00*

*I declare under penalty of perjury that this information is true.*

Date: 8/7/2024

*Server's signature*

Ace Attorney Service, Inc.

**West Suite 800, L-2**

1000 Wilshire Boulevard • Suite 1000 • Los Angeles, CA 90020

Phone: (213) 623-3979 / Fax: (213) 623-7527

**Registration No.: / County:**

### *Server's Address*

Additional information regarding attempted service, etc.:

N.Z., R.M., B.L., S.M., and A.L., individually and on behalf of themselves and all others similarly situated vs FENIX INTERNATIONAL LIMITED, et al.

1 Christopher R. Pitoun (SBN 290235)  
2 HAGENS BERMAN SOBOL SHAPIRO LLP  
3 301 N. Lake Avenue, Suite 920  
4 Pasadena, California 91101  
5 Telephone: (213) 330-7150  
6 Facsimile: (213) 330-7152  
7 Email: christopherp@hbsslaw.com

8 Robert B. Carey (*pro hac vice forthcoming*)  
9 Michella A. Kras (*pro hac vice forthcoming*)  
10 HAGENS BERMAN SOBOL SHAPIRO LLP  
11 11 West Jefferson, Suite 1000  
12 Phoenix, Arizona 85003  
13 Telephone: (602) 840-5900  
14 Facsimile: (602) 840-3012  
15 Email: rob@hbsslaw.com  
16 michellak@hbsslaw.com

17 *Attorneys for Plaintiffs*

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

N.Z., R.M., B.L., S.M., and A.L.,  
individually and on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

FENIX INTERNATIONAL LIMITED,  
FENIX INTERNET LLC, BOSS  
BADDIES LLC, MOXY  
MANAGEMENT, UNRULY AGENCY  
LLC (also d/b/a DYSRPT AGENCY),  
BEHAVE AGENCY LLC, A.S.H.  
AGENCY, CONTENT X, INC., VERGE  
AGENCY, INC., AND ELITE  
CREATORS LLC,

Defendants.

Case No. \_\_\_\_\_

**CLASS ACTION COMPLAINT**

**ACTION SEEKING  
STATEWIDE OR NATIONWIDE  
RELIEF**

**DEMAND FOR JURY TRIAL**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

N.Z., et al. v. FENIX INTERNATIONAL LIMITED, et al.  
Case No. 8:24-cv-01655-FWS-SSC

**ATTACHMENT A TO SUMMONS**

**DEFENDANTS TO BE SERVED (CONTINUED):**

FENIX INTERNET LLC  
C/O CASTLE PINES, INC.  
501 Silverside Road, Suite 87  
Wilmington, DE 19809

BOSS BADDIES LLC  
C/O REGISTERED AGENTS INC.  
2800 E Enterprise Avenue, Suite 333  
Appleton, WI 54913-7889

MOXY MANAGEMENT  
C/O ERESIDENTAGENT, INC.  
9000 Sunset Boulevard, Suite 1260  
Los Angeles, CA 90069

UNRULY AGENCY LLC (also d/b/a DYSRPT AGENCY)  
C/O VCORP AGENT SERVICES, INC.  
25 Robert Pitt Drive  
Monsey, NY 10952

BEHAVE AGENCY LLC  
C/O VCORP AGENT SERVICES, INC.  
25 Robert Pitt Drive  
Monsey, NY 10952

A.S.H. AGENCY  
C/O Harold Laufer  
216 S Hamilton Drive, Unit A  
Beverly Hills, CA 90211

CONTENT X, INC.  
C/O Reggie Gooden  
21800 W Oxnard Street, Suite 940  
Woodland Hills, CA 91367

VERGE AGENCY, INC.  
10960 Wilshire Boulevard, 5th Floor  
Los Angeles, CA 90024

ELITE CREATORS LLC  
C/O Andrew Bachman  
205 SE 20th Street,  
Fort Lauderdale, FL 33316